



Mike Zarba <mzarba@newmilford.org>

## RE: Interim Remedial Action Report

1 message

Tisa, Kimberly <Tisa.Kimberly@epa.gov>

Tue, Jul 14, 2015 at 11:28 AM

To: Mike Zarba <mzarba@newmilford.org>

Cc: "Trombly, Gary" <Gary.Trombly@ct.gov>, "Tisa, Kimberly" <Tisa.Kimberly@epa.gov>

Mike:

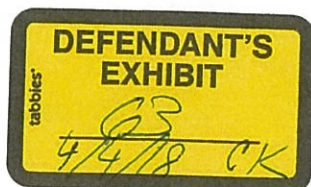
A few additional comments for consideration. I've tried to go back through the Phase 1 and Phase 2 submittals, but it's time consuming and I need to make sure we're all on the same page for the Phase III.

As you and I discussed, the overall objective for Phase III is to remove all PCBs within the building footprint to achieve a < 1 ppm PCB cleanup standard. You believe the monies that the Town currently have will be sufficient for this. Based on this, any approval issued by EPA will have this as the primary objective with a contingency to leave higher PCB concentrations under a low occupancy area use (see § 761.3 definition) if the < 1 ppm cannot be achieved or if monies are insufficient. Depending upon the PCB concentrations remaining and the uncertainty of when development may occur, if PCBs > 1 ppm remain at the Site following the Phase III work, additional controls may be necessary and the Town will need to record a deed notice to document site conditions.

I know you had indicated that you thought this would address everything, but just to let you know, there are still issues within at least 1 of the outfalls and perhaps the piping outside the building that would remain outstanding, I believe.

### Additional Comments:

1. For the T-1 area, following removal of the soil, we need to discuss the verification sampling. Currently, it's 5-foot intervals with compositing. As the delineation is not complete here, I don't believe that compositing is supported, but we can discuss.
2. For the lumber storage area, following removal, it appears that a 50' soil verification sampling frequency is proposed. If so, could you clarify how the composite samples would be collected.
3. Following removal of 1" of the building-wide concrete, composite sampling on a 50-foot center is proposed. The notification indicates that each composite would contain 4 to 5 discrete samples and with an actual level of 0.25 ppm. If the composite contains 5 samples, the action level would be 0.2 ppm, not 0.25 ppm.



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4. Given the above questions on composite sampling, it would be helpful if one or two examples of the compositing scheme for soils and concrete could be provided for clarification.

5. Please confirm EPA's understanding of waste disposal as follows:

- T4-6 concrete slab will be removed/disposed as a  $\geq 50$  ppm PCB waste
- T1 soils (SB-7A and SB-9A areas) will be removed/disposed as a  $\geq 50$  ppm PCB waste
- Building-wide milled concrete will be removed/disposed as a  $< 50$  ppm PCB waste
- Drain lines, associated piping and residual will be removed/disposed as a  $\geq 50$  ppm PCB waste
- Acid lines and overlying concrete will be removed/disposed as a  $< 50$  ppm PCB waste
- Soil at E4-B14 to be removed/disposed as a  $< 50$  ppm PCB waste
- Soils exterior to the electrical room will be removed/disposed as a  $< 50$  ppm PCB waste
- Concrete foundation exterior to the electrical room to be removed/disposed as a  $< 50$  ppm PCB waste
- Concrete slab removed in the lumber storage area to be disposed as a  $< 50$  ppm PCB waste

6. The notification indicates that the overhead cranes had PCBs at  $> 10 \mu\text{g}/100 \text{ cm}^2$  and would be disposed in a non-TSCA facility and may be decontaminated. What are the PCB concentrations on the cranes? Are the PCBs in the paint rather than in dust?

7. Clarification on removal/disposal of concrete at B38 and B39 locations is requested

8. The notification indicates that the  $< 50$  ppm PCB caulk/glazing is a CT-regulated waste and that it will be removed prior to building demolition. Please clarify where this waste will be disposed of.

9. Just a note for your consideration, for the steel beams, etc, and for recycling, do we need to be concerned about contamination from dust, etc?

Thanks for your patience on this, but EPA needs to be clear on what is being done for this phase of work.

**Kimberly N. Tisa, PCB Coordinator (OSRR07-2)**

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SDS-0003097

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**From:** Tisa, Kimberly  
**Sent:** Monday, July 13, 2015 4:58 PM  
**To:** 'Mike Zarba'  
**Cc:** 'Trombly, Gary'; Tisa, Kimberly  
**Subject:** RE: Interim Remedial Action Report

Mike:

I have gone back through the Tighe & Bond report, your proposed plan and the responses to EPA's comments. I am still a little confused on exactly what is being done and why. As TRC put this together it may help us to have a discussion with them. In the meantime, I provide the following as points of discussion.

1. TRC Figure 3. For the T-1 area there is reference to T-1-SB-9(A) and the T&B IRAR. On Figure 5-1 of the IRAR, there is no sample location indicated as T-1-SB-9(A), but rather T-1-SB-8(A) within the SB-9 grid. EPA assumes that there is a typo in the IRAR and that the sample should be T-1-SB-9(A) within the SB-9 grid.
2. TRC Figure 3. For the Electrical Room (shown as Inset A), in the T&B IRAR, sample location E1 OB SW9 appeared to show a PCB concentration of 1.9 ppm and is also shown in Table 6-1 of the IRAR. However, it is not shown on the TRC Figure 3 as a sampling location with > 1 ppm. What is shown on Figure 3 is E1-OB-SW6 with a PCB concentration of 1.44 ppm. On page 5-6 of the IRAR, Section 5.4.1, 2<sup>nd</sup> paragraph, it indicates that additional soil removal occurred in this area and that the February 12, 2008 results were ND for PCBs.
3. Please clarify the reason for the soil excavation proposed at sample location E4-B14. Table 6-4 of the IRAR indicates that the soil sample was 0.55 ppm and thus < 1 ppm.
4. For the Lumber Storage and Box Shop, there is reference to Figure 2 for sub-slab sampling locations. EPA was unable to find these sample locations on Figure 2. Please clarify.
5. For sample location B-38, it is indicated that delineation samples will be collected from the bottom of slab at each grid corner point and from the subslab soil. There is also reference to additional delineation on a 10-foot grid. The same work will also be conducted at B-39. Please clarify why both are post-milling delineation samples and how each set of data will be used.

My apologies for continued questions, but it is very difficult to follow all the nuances as presented and I need to make sure both EPA and CTDEEP understand what is to be conducted under Phase III.

SDS-0003098

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**From:** Mike Zarba [mailto:mzarba@newmilford.org]

**Sent:** Friday, June 12, 2015 8:18 AM

**To:** Tisa, Kimberly

**Cc:** Trombly, Gary; Doubleday, Edward

**Subject:** Fwd: Interim Remedial Action Report


Good Morning Kim:

Please find attached the reply and revised IRAR pages from Jim Olsen at Tighe & Bond in reference to comment # 1 of your April 2, 2015 review. This confirms your original finding that this sample location was inconsistent in the original report. Please replace the two pages with the revised updated pages attached hereto.

I believe this was the last bit of information you were looking for in reference to your original review, however if you need any additional information please do not hesitate to contact me.

Again, thank you for your time and attention in reviewing this project. Take Care,





*Michael F. Zarba, P.E.*

Public Works Director

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----- Forwarded message -----

From: **James T. Olsen** <[JTolsen@tighebond.com](mailto:JTolsen@tighebond.com)>

Date: Thu, Jun 11, 2015 at 7:10 PM

Subject: RE: Interim Remedial Action Report

To: Mike Zarba <[mzarba@newmilford.org](mailto:mzarba@newmilford.org)>

Hi Mike,



Sorry for delay on this. You are correct and that is a mistake. Attached are the revised pages.

Please let me know if you need anything else.

Jim


**From:** Mike Zarba [<mailto:mzarba@newmilford.org>]

**Sent:** Tuesday, April 21, 2015 1:56 PM

**To:** James T. Olsen

**Subject:** Interim Remedial Action Report

Jim:



As we discussed can you please confirm that the appropriate information is contained in the IRAR and/or update the appropriate information as follows?

EPA had commented about an inconsistency of data presented in that report. Specifically regarding a test sample (T-3-SB-1-SW-2) which is referenced on page 5-5 of your narrative as T-3-SB-1-SW-3 - I believe that should reference T-3-SB-1-SW-2. The narrative states that this sample exceeded the 1.0 mg/Kg limit at 1.1 mg/Kg, however the corresponding table (Table 5-3) shows a ND for this sample.

I included scans of the three pages and have highlighted the areas that I believe need confirmation and/or updating. Again can you please check this information and issue the appropriate changes, if necessary.

Please let me know if you have any questions.

Thank You,

*Michael F. Zarba, P.E.*

Public Works Director

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